



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
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June 24, 2016

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2016 ETC Annual Report of Smithville Telephone Company
Study Area Code 280467**

Dear Ms. Dortch:

On behalf of Smithville Telephone Company (“Company”), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the Company’s Progress Report on its Five-Year Service Quality Improvement Plan and of outage reporting as required by Section 54.313.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313.



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June 24, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2016 ETC Annual Report of Smithville Telephone Company
Study Area Code 280467
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Smithville Telephone Company (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,¹ withholding from public inspection certain information contained in attachments to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment are attachments to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).³
2. Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission a Five-Year Service Quality Improvement Plan (“Five-Year Plan”) Progress Report⁴ and must also report outages, both of which are contained in attachments to the 2016 Report.
3. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. The Company also seeks withholding from public inspection data pertaining to the Company’s outages provided at FCC Form 481 Line 200 attachment, Service Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

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9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

4. With respect to identifying the degree to which the Five-Year Plan concerns a service that is subject to competition, the Line 112 attachment contains information of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment includes competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachments is information that is not customarily released to the public. The Five-Year Plan information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachments, the Company is filing the Five-Year Plan and outage attachments under seal. The Company uses the

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

- information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
 8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
 9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.⁶ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment, and to the Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

⁶ See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.

<010> Study Area Code	280467
<015> Study Area Name	SMITHVILLE TEL CO
<020> Program Year	2017
<030> Contact Name: Person USAC should contact with questions about this data	Roger V. Thompson
<035> Contact Telephone Number: Number of the person identified in data line <030>	6626514131 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	roger@traceroad.net
Form Type	54.313 and 54.422

(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010> Study Area Code	280467
<015> Study Area Name	SMITHVILLE TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035> Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net

<110> Has your company received its ETC certification from the FCC? (yes / no)

If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC? (yes / no)

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

280467ms112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes

**(300) Unfulfilled Service Request
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	280467
<015> Study Area Name	SMITHVILLE TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035> Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net

<300> Unfulfilled service request (voice)

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

**(500) Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	280467ms510.pdf

**(600) Functionality in Emergency Situations
Data Collection Form**

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FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	280467ms610.pdf

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	280467
<015> Study Area Name	SMITHVILLE TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035> Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

(1000) Voice and Broadband Service Rate Comparability Data Collection Form	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

(1100) No Terrestrial Backhaul Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	280467ms1210.pdf
		Name of Attached Document

<1220>	Link to Public Website	HTTP
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"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

(2000) Price Cap Carrier Additional Documentation	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support	<input style="width: 100%;" type="text"/>	
<2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support	<input style="width: 100%;" type="text"/>	
<2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	<input style="width: 100%;" type="text"/>	
<2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.	<input style="width: 100%;" type="text"/>	
<2024A> Round 2 Recipient of Incremental Support?	<input style="width: 100%;" type="text"/>	<input style="width: 100%; height: 50px;" type="text"/>
<2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	<input style="width: 100%; height: 50px;" type="text"/>
<2025A> Round 1 or Round 2 Recipient of Incremental Support?	<input style="width: 100%;" type="text"/>	
<2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-	Name of Attached Document Listing Required Information	<input style="width: 100%; height: 50px;" type="text"/>
<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		<input style="width: 100%;" type="text"/>

(2000) Price Cap Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing Required Information

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2017
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<039>	Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009) Progress Report on 5 Year Plan
Carrier certifies to 54.313(f)(1)(iii)

(3010A) Milestone Certification {47 CFR § 54.313(f)(1)(i)} Yes - Attach Certification

(3010B) Please Provide Attachment Name of Attached Document Listing Required Information

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)} No - No New Community Anchors

(3012B) Please Provide Attachment Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} (Yes/No)

(3014) If yes, does your company file the RUS annual report (Yes/No)

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.

If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information Name of Attached Document Listing Required Information

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(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net

Financial Data Summary

(3027) Revenue		<input type="text"/>
(3028) Operating Expenses		<input type="text"/>
(3029) Net Income		<input type="text"/>
(3030) Telephone Plant In Service(TPIS)		<input type="text"/>
(3031) Total Assets		<input type="text"/>
(3032) Total Debt		<input type="text"/>
(3033) Total Equity		<input type="text"/>
(3034) Dividends		<input type="text"/>

**(4005) Rural Broadband Experiment Additional Documentation
Data Collection Form**

**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013**

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. Name of Attached Document Listing Required Information _____

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481. Name of Attached Document Listing Required Information _____

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area. Name of Attached Document Listing Required Information _____

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	280467
<015> Study Area Name	SMITHVILLE TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035> Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	280467
<015> Study Area Name	SMITHVILLE TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035> Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	roger@traceroad.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John Staurulakis, Inc.
Name of Reporting Carrier:	SMITHVILLE TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/22/2016
Printed name of Authorized Officer:	Roger Thompson
Title or position of Authorized Officer:	President
Telephone number of Authorized Officer:	6626514131 ext.
Study Area Code of Reporting Carrier:	280467 Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	SMITHVILLE TEL CO
Name of Authorized Agent Firm:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/22/2016
Name of Authorized Agent Employee:	Wes Robinson
Title or position of Authorized Agent or Employee of Agent	Manager - Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent:	5123380473 ext.
Study Area Code of Reporting Carrier:	280467 Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

REDACTED FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report**

ATTACHMENT REDACTED IN ENTIRETY

Smithville Telephone Company

Study Area Code: 280467

Response to Line 510 – Service Quality Standards and Consumer Protection Rule

Compliance for Voice and Broadband

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Smithville Telephone Company (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Mississippi Public Service Commission which disclose rates, terms, and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

providers under Title 39 Utilities, Part III rules and Regulations Governing Public Utility Service, Subpart 1, General Rules, and Subpart 3, Special rules – Telephone Companies, including requirements for customer service, billing, consumer complaints, rates and charges, and slamming, under Mississippi Code Annotated Title 77, Chapter 3 statutes; (3) truth-in-billing requirements; and (4) CPNI rules, and (5) red flag rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is also subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order*, as it applies to the Company.

Smithville Telephone Company

Study Area Code: 280467

Response to Line 610 - Ability to Function in Emergency Situations

Smithville Telephone Company (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and in accordance with the orders in Mississippi Public Service Commission Docket No. 2005-AD-662. The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically in accordance with the orders in Mississippi Public Service Commission Docket No. 2005-AD-662, the Company has a reasonable amount of backup power to ensure functionality without an external power source, is able to reroute traffic and manage traffic spikes. In addition, the Company has comprehensive emergency operations plans in place and will adhere to the Federal Communications Commission’s reporting requirements regarding outages and provide copies of such reports to the Mississippi Commission upon request.

The Company’s standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

Smithville Telephone Company

Study Area Code: 280467

Rates, Terms and Conditions for Lifeline Service

(Response to Form 481, Line 1210)

Local exchange service rates and charges as specified below are for basic local exchange service. The rates for other ancillary services not specifically shown below are presented in Smithville Telephone Company's tariff(s) on file with the Mississippi Public Service Commission. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates:^{1 2}

Exchange Name	R-1 Rate
Smithville	\$18.00

¹ Above listed fees do not include mandatory taxes, fees and surcharges.

² Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

GENERAL SUBSCRIBER SERVICES TARIFF
SMITHVILLE TELEPHONE COMPANY, INC.
TC-003-0027-00

SECTION IV
6th Revised Sheet 16
Cancels 5th Revised Sheet 16

FILED 12-UN-0113

MAR 15 2012

SERVICE CONNECTION CHARGES

APPROVED

MISS. PUBLIC SERVICE
COMMISSION
PUBLIC UTILITIES STAFF
LOW-INCOME ASSISTANCE PROGRAM

SERVICE CHARGES

APR 15 2012

MISS. PUBLIC SERVICE
COMMISSION (T)
PUBLIC UTILITIES STAFF (T)

General

The Company, as part of its obligations as an Eligible Telecommunications Carrier, offers a low-income assistance program. This program, Lifeline Assistance, is offered under the terms and conditions provided below: (T)

Lifeline Assistance

A. General

Lifeline Assistance is a retail service offering available to qualifying low-income subscribers, as provided for below. Lifeline Assistance enables eligible subscribers to pay reduced charges for the following package of services: voice-grade access to the public switched network; local usage; dual-tone multi-frequency signaling or its functional equivalent; access to emergency services; access to operator services; access to interexchange service; access to directory assistance; and toll blocking. An eligible customer receives credit for the Low-Income Assistance Program pursuant to FCC Order 12-11 and pursuant to MPSC Docket 2007-AD-487. (T)

B. Regulations

1. Unless other eligibility requirements are established by the Commission, Lifeline Assistance is available to all residential subscribers who participate in one of the following programs:
 - a) Medicaid,
 - b) Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps, (T)
 - c) Supplemental Security Income (SSI),
 - d) Federal Public Housing Assistance (FPHA),
 - e) Low-Income Home Energy Assistance Program (LIHEAP),
 - f) Temporary Assistance to Needy Families (TANF),
 - g) National Free Lunch Program's Free Lunch Initiative (NFLP).

Income-Based Criteria :

Household gross monthly income that does not exceed 135% of the Federal Poverty Guidelines

2. Each subscriber to Lifeline Assistance must certify in writing to the Company, under penalty of perjury, that he/she receives benefits under a program outlined in sub-paragraph B.1., above, and must, on the same document, agree to notify the Company if he/she ceases to participate in the program(s). The certification form shall conform to the requirements described herein, and shall be made available upon request to any subscriber. The Company shall retain all such subscriber certifications pursuant to FCC Order 12-11 in order to furnish proof of subscriber eligibility as may be required from time to time by Universal Service administrators. (T)

Issue Date: 3/15/12
Effective Date: 4/15/12
Order Number:

Filed By: Roger V. Thompson, President
P. O. Box 117
Smithville, Mississippi 38870

GENERAL SUBSCRIBER SERVICES TARIFF
SMITHVILLE TELEPHONE COMPANY, INC.
TC-003-0027-00

SECTION IV
3rd Revised Sheet 16.1
Cancels 2nd Revised Sheet 16.1

FILED 12-UN-0113

MAR 15 2012

MISS. PUBLIC SERVICE
COMMISSION
PUBLIC UTILITIES STAFF

SERVICE CONNECTION CHARGES

APPROVED

SERVICE CHARGES

APR 15 2012

LOW-INCOME ASSISTANCE PROGRAM (Continued)

MISS. PUBLIC SERVICE (T)
COMMISSION
PUBLIC UTILITIES STAFF

Lifeline Assistance (Continued)

B. Regulations (Continued)

- 3. All applications for this service are subject to verifications with the state agency responsible for administration of the qualifying program. The Company may request any additional documentation deemed necessary prior to providing Lifeline benefits such as an administrating agency's official designation of eligibility in a particular means-based program sub-paragraph B.1., above, and that the telephone subscriber is the financially responsible party for the qualifying member of his or her household, or that the eligible household member is the telephone subscriber's dependent pursuant to the rules and regulations of the Internal Revenue Service. (D) (T)
- 4. The Company will reconcile and confirm eligibility periodically pursuant to FCC Order 12-11. At least annually an FCC-compliant random survey of a statistically valid number of the Lifeline subscribers which request that each surveyed subscriber verify under penalty of perjury that they, or a member of their household continue to participate in one of the means-based programs approved herein for eligibility by the Commission and/or survey at least annually the entire Lifeline subscriber base requesting that each surveyed subscriber verify under penalty of perjury that they, or a member of their household continue to participate in one of the means-based programs established by the Commission as eligible for lifeline funding. Lifeline subscribers who are subsequently determined to be ineligible shall be notified of their ineligibility in writing by the Company and provided 60 days from the date of such notice to rectify or otherwise demonstrate their eligibility prior to the discontinuance of their Lifeline benefits. All unresolved disputes regarding Lifeline eligibility shall be brought to the attention of the Commission for resolution. (T) (T)
- 5.
- 6. A subscriber may elect at the time of subscription to Lifeline Assistance to receive toll blocking as part of Lifeline Assistance at no charge. "Toll Blocking" is a service that allows a subscriber to elect not to allow the completion of outgoing toll calls from the subscriber's residence. Local service deposit requirements will be waived for customers who voluntarily receive Toll Limitation Service. (T)

Issue Date: 3/15/12
Effective Date: 4/15/12
Order Number:

Filed By: Roger V. Thompson, President
P. O. Box 117
Smithville, Mississippi 38870

GENERAL SUBSCRIBER SERVICES TARIFF
SMITHVILLE TELEPHONE COMPANY, INC.
TC-003-0027-00

SECTION IV
1st Revised Sheet 16.1-A
Cancels Original Sheet 16.1-A

FILED 12-UN-0113

MAR 15 2012

SERVICE CONNECTION CHARGES

APPROVED

MISS. PUBLIC SERVICE
COMMISSION
PUBLIC UTILITIES STAFF

SERVICE CHARGES

APR 15 2012

LOW-INCOME ASSISTANCE PROGRAM (Continued)

MISS. PUBLIC SERVICE (T)
COMMISSION
PUBLIC UTILITIES STAFF

Lifeline Assistance (Continued)

B. Regulations (Continued)

- 7. Lifeline Assistance will not be disconnected for non-payment of toll charges, however, in the event toll charges are not paid within 10 days of the mailing of the Company bill, the Company will implement Toll Blocking immediately thereafter. In addition, the Company will not deny re-establishment of local service to customers who are eligible for Lifeline Assistance and have previously been disconnected for non-payment of toll charges. Lifeline Assistance will not be connected if an outstanding balance is owed by the customer for local service.
- 8. The Company may not collect a service deposit in order to initiate lifeline Assistance if the qualifying low-income subscriber voluntarily elects toll blocking from the Company, where available. If toll blocking is unavailable, then the Company may charge a service deposit.
- 9. (D)
(D)
- 10. Only one Lifeline service is available per residential household pursuant to FCC Order 12-11. A household is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. A household is not permitted to receive Lifeline benefits from multiple providers. (T)
- 11. A Lifeline customer may subscribe to any local service offering available to other residential customers.
- 12. The PIC charge will not be billed to Lifeline customers who subscribe to toll blocking and do not presubscribe to a long distance carrier.

Issue Date: 3/15/12
Effective Date: 4/15/12
Order Number:

Filed By: Roger V. Thompson, President
P. O. Box 117
Smithville, Mississippi 38870

GENERAL SUBSCRIBER SERVICES TARIFF

SMITHVILLE TELEPHONE COMPANY, INC.
TC-003-0027-00

SECTION IV
2nd Revised Sheet 16.2
Cancels 1st Revised Sheet 16.2

FILED

12-UN-0113

MAR 15 2012

SERVICE CONNECTION CHARGES

APPROVED

MISS. PUBLIC SERVICE
COMMISSION
PUBLIC UTILITIES STAFF

SERVICE CHARGES

APR 15 2012

LOW-INCOME ASSISTANCE PROGRAM (Continued)

MISS. PUBLIC SERVICE (T)
COMMISSION
PUBLIC UTILITIES STAFF

Lifeline Assistance (Continued)

C. Credits

- 1. The following credit* will apply for each customer eligible for Lifeline Assistance: (T)

Monthly Credit*

- a) Lifeline Credit ① \$ 9.25 (I) (C)

(D)
|
(D)

- 2. The Company shall apply the baseline payments received by the administrator of the Federal Lifeline Assistance program to the qualifying customer's basic local exchange service rate, pursuant to FCC Order 12-11 and MPSC Docket 2007-AD-487. (T)

|
(T)

- 3. Partial payments that are received from Lifeline customers shall first be applied to local service charges and then to any outstanding toll charges.

* Credit amount will not exceed the total of the basic Residential Local Exchange and Subscriber Line Charge rate. (T)
(D)

|
|
(D)

①Rates are in compliance with FCC Order 12-11 and are effective on dates determined by the FCC under Order 12-11. (N)
(N)

Issue Date: 3/15/12
Effective Date: 4/15/12
Order Number:

Filed By: Roger V. Thompson, President
P. O. Box 117
Smithville, Mississippi 38870

Smithville Telephone Company

Study Area Code: 280467

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Smithville Telephone Company hereby certifies that throughout 2015, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, Smithville Telephone Company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.

REDACTED FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3026

ATTACHMENT REDACTED IN ENTIRETY